REMARKS/ARGUMENTS

The Office Action of June 6, 2008 has been reviewed and carefully considered.

Reconsideration of the above-identified application, as herein amended, is respectfully requested.

Status of the Application

Previously pending claims 18, 21, 22, 24 and 25, with claim 18 being independent, remain pending in this application, and new claims 28-32, with claims 30-32 being independent, have been added.

In the Office Action, the Examiner objected to claims 18 and 22. Claims 18-21 and 23-27 were rejected under 35 USC §103(a) as unpatentable in view of U.S. Patent No. 7,109,985 ("Spencer") in view of U.S. Patent Publication No. 2002/0147748 ("Huang"); and claim 22 was rejected under 35 USC §103(a) as unpatentable over Spencer and Huang and further in view of U.S. Patent No. Publication No. 2005/023757 ("Motamed"). Other objections and rejections in the Office Action have been rendered moot by the cancellation without prejudice of those claims to which the rejections relate, and, therefore those rejections are not addressed. Applicants, having carefully considered the Examiner's rejections, together with the comments provided in support thereof, respectfully traverse these rejections and submit that the invention as now claimed is patentably distinct over the applied references, whether taken individually or in combination.

Objections to the IDS

Applicants note that the references identified in the SB08 forms submitted with the IDS filed on May 5, 2005 have not been considered. Applicants submit herewith a replacement SB08 form correcting the U.S. publication numbers, which in the filed IDS inadvertently omitted

a leading zero in the publication number following the year. Additionally, Applicants point out that the foreign references listed on the SB08 forms were cited in the International Search Report and have accordingly already been supplied to the U.S.P.T.O. by WIPO; therefore, in accordance with U.S. practice, additional copies of those foreign references need not be submitted. Applicants request that the Examiner review and consider the references cited therein, and initial and return to Applicants the SB-08 forms included herewith.

Objections to the Claims

Claims 18 and 23 were objected to for various informalities. Applicants have amended claims 18 and 22 in consideration of the Examiner's comments. Withdrawal of the objections to the claims is therefore requested.

The Examiner rejected claims 26 and 27 under 35 U.S.C. § 112 as indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Claims 26 and 27 have been cancelled without prejudice, rendering this rejection moot.

Prior Art Rejections

The Examiner rejected claims 18, 21, 24, and 25 under 35 USC §103(a) as unpatentable over U.S. Patent No. 7,109,985 ("Spencer") in view of U.S. Patent Publication No. 2002/0147748 ("Huang"); and claim 22 under 35 USC §103(a) as unpatentable over Spencer and Huang and further in view of U.S. Patent No. Publication No. 2005/023757 ("Motamed").

The Present Disclosure

The present disclosure relates to a system for dynamic generation of images to be transmitted to a remote terminal.[1] A server includes stored source images and a processor. The processor generates images intended for the remote terminal in a format that is compatible with the remote terminal from the source images. The source images are typically vector images. A description file for each source image includes a description of the characteristics of the source image and at least one tag adapted to cause a manipulation of all or part of the source image. The system includes an apparatus for generating a modified vector image from a source image by replacement of at least one tag by an instruction code in the description file of the source image.

The tag relates to attributes or manipulations, i.e., modifications, applied to the image. In one embodiment tags are replaced in the description file. Tag replacement occurs according to argument values conveyed by a request received from a remote terminal. In other words, tag replacement is performed based on the needs or requirements of the remote terminal for display of the image associated with the description file. Images are generated that comply with display limitations of the remote terminal. (Specification, as published, par. [0005]). For example, the remote terminal can send an indication of a maximum image size which can be displayed by this remote terminal, and a "clipping" tag, "resize height" and resize "width" tags to generate a manipulated image, i.e., clipped or resized, for display on the remote terminal. (Specification, as published, pars. [0068]-[0073].).

As disclosed, processing stage 20 recovers argument values conveyed in the requests transmitted by the remote terminal, inserts the arguments into the corresponding tag attributes,

[1] These descriptive details are provided only for the convenience of the Examiner as part of the discussion presented herein, and are not intended to argue limitations that are not claimed. Further, this is not intended to argue any interpretation of any claim term that is narrower than would be understood by one of ordinary skill in the art in the context of the specification and the claims as a whole.

and then carries out execution of the programs, according to the tags contained in the image files and the arguments recovered from the requests, to thereby generate the instruction codes. In other words, a tag adapted to cause manipulation of an image is replaced in the description file of a source image by an instruction code, as for example an SVG code. The instruction code is then inserted into the file instead of and in replacement of the tag. (Specification, as published, par. [0055].). A modified image is created based on the modified description file.

Further processing means apply a stylesheet to the images in order to complete the display by inserting display data. In other words, the stylesheet dictates the overall display of a page, not the modification of an image. For example, the stylesheet may be a stylesheet in JAVA programming language or a JSP ("Java Server Page") stylesheet to introduce an upstream data display insertion mechanism, prior to the generation of images in GIFF, JIPEG, PNG, TIFF, etc. format that can be directly displayed on the screen of the remote terminal. (Specification, as published, pars. [0097]-[0098].). Thus, the description file and associated tags are not stylesheets.

Claims 18, 21, 24, and 25 are allowable over Spencer in view of Huang

Among the limitations of independent claim 18 not present in the cited combination is "replacement of at least one tag of said one or more tags in the description file of said source image by an instruction code according to argument values conveyed by a request received from the at least one remote terminal; and ... converting the modified description file into an image having a format that is compatible with said at least one remote terminal."

The Office Action acknowledges that Spencer does not disclose "wherein said system comprises means for generating a modified vector image from a source image by replacement of at least one tag by an instruction code in said description file of said source image." The Office

Action attempts to cure this noted deficiency with Huang. However, Huang merely relates to stylesheet design and fails to cure the deficiency noted in the Office Action.

Huang discloses extensible stylesheet design using meta-tag information. Specifically, a source XML file is transferred into a target file using meta-tag information to design extensible stylesheets. (See Huang, par. [0064].). All of the meta-tag information of a document in computer memory to be displayed is manipulated so that it will be replaced, as a stylesheet applies to the whole file. (See Huang, par. [0067].). Huang does not disclose a tag, adapted to cause manipulation of an image, that is replaced in the description file of a source image by an instruction code such as an SVG code. Huang is, instead, directed merely to the overall display of a document using a stylesheet, in contrast to modification of an image for display as in Applicants' claims.

Huang is silent with respect to replacing at least one tag in a description file of a source image with an instruction code. Huang only relates to stylesheets based on meta-tag information. As discussed above, a stylesheet is not a description file. Huang provides no reason to modify Spenser to generate a modified vector image from a source image by replacement of at least one tag by an instruction code in said description file of said source image because Huang is unrelated to description files.

Claim 18 is directed to "replacement of at least one tag of said one or more tags in the description file of said source image by an instruction code", in contrast to Huang which is simply directed to stylesheet design. Huang is absolutely silent with respect to an image description file or the replacement of at least one tag in such a description file by an instruction code according to argument values conveyed by a request received from a remote terminal, and converting the modified description file into an image having a format that is compatible with

said remote terminal. Claim 18 is accordingly deemed to be allowable over the combination of Spencer and Huang.

Claims 22, 24, 25, 28 and 29 depend from, and contain all the limitations of, claim 18. These dependent claims recite additional limitations which, in combination with the limitations of claim 18, are neither disclosed nor suggested by Spencer and Huang, whether taken alone or in combination, and therefore correspondingly recite patentable subject matter. Claims 22, 24, 25, 28 and 29 should also be allowed.

Claims 30-32 are allowable for at least the same reasons discussed above with respect to claim 18. In particular, each of claims 30-32 recites generating a modified description file by replacing at least one tag in the description file of the source image with an instruction code according to one or more argument values conveyed by a request received from a remote terminal. As discussed above with respect to claim 18, this feature is not disclosed in either Spencer or Huang. Thus, claims 30-32 are also in condition for allowance.

Conclusion

Because the cited prior art references, whether taken alone or in combination, fail to disclose generating a modified description file by replacing at least one tag in the description file of a source image with an instruction code according to one or more argument values conveyed by a request received from a remote terminal, each of the now pending claims is patentable over that art and in condition for allowance.

A check in the amount $710.00 is enclosed in payment of the government fee for the addition of one independent claim in excess of three and the 2-month extension of time.

Applicant has responded to all of the rejections and objections recited in the Office Action. Reconsideration and a Notice of Allowance for all of the pending claims are respectfully

requested. If the Examiner believes that an interview would be of assistance, the Examiner is encouraged to contact the undersigned at the telephone number listed below.

It is believed that no additional fees or charges are required at this time in connection with the present application. However, if any such fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,
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